

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:18-md-02323-AB

MDL No. 2323

**Kevin Turner and Shawn Wooden, on
behalf of themselves and others similarly
situated,**

Plaintiffs,

v.

**National Football League and NFL
Properties, LLC, successor-in-interest to
NFL Properties, Inc.,**

Defendants.

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:

2:12-md-02323-AB

**DECLARATION OF RICHARD S. LEWIS PURSUANT TO THE
COURT'S ORDER DATED MARCH 28, 2018**

I, RICHARD S. LEWIS, hereby declare pursuant to this Court's Order dated March 28, 2018, and state as follows:

1. I am a partner at Hausfeld LLP ("HLLP");
2. I was appointed by this Court to serve on the Executive Committee in the above captioned action. Michael D. Hausfeld of HLLP was also appointed by this Court to serve on the Executive Committee, and Jeannine M. Kenney of HLLP was appointed by this Court to serve as Liaison Counsel. (Dkt. No. 64);

3. HLLP previously represented, but no longer represents 91 Settlement Class Members in this litigation;
4. HLLP currently represents 289 Settlement Class Members in this litigation;
5. To the best of my knowledge, 15 Settlement Class Members currently and/or previously represented by HLLP have received a Monetary Award;
6. 25 Settlement Class Members currently and/or previously represented by HLLP have been informed that they are entitled to receive a Monetary Award;
7. 45 Settlement Class Members currently and/or previously represented by HLLP have applied for a Monetary Award;
8. HLLP currently and/or previously represents 380 Settlement Class Members. Their eligibility to receive a Monetary Award has not yet been determined;
9. 6 Settlement Class Members currently and/or previously represented by HLLP have entered into agreements to assign their rights to a Monetary Award to a third-party funder (“Assignments”);
10. 6 Settlement Class Members currently and/or previously represented by HLLP have entered into Assignments with a third-party funder;
11. HLLP was instructed by 6 current and/or previously represented Settlement Class Members to comply with the terms of the Assignments of third-party funders, and is obligated to pay a portion of the Settlement Class Members’ Monetary Award to third-party funders;
12. None;
13. None; and
14. None.

15. Attached as Exhibits 1-6, are the redacted Assignments entered into by Settlement Class Members A-F, currently and/or previously represented by HLLP.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 4/26/18


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CERTIFICATE OF SERVICE

It is hereby certified that on April 26, 2018, a true copy of the foregoing DECLARATION OF RICHARD S. LEWIS was electronically filed via the CM/ECF system for the United States District Court for the Eastern District of Pennsylvania, which will send notice of electronic filing to all counsel of record.


RICHARD S. LEWIS